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Charitable Number
89793 2091 RR0001

Public Input Coordinator,
Conservation and Source Protection Branch
Ministry of the Environment, Conservation and Parks
300 Water Street North Tower, 5th Floor
Peterborough, ON K9J 3C7

December 21, 2025

Re: ERO #025-1257 – Proposed boundaries for the regional consolidation of Ontario's conservation authorities.

The Oshawa Second Marsh is one of the largest remaining coastal wetlands on the north shore of Lake Ontario. It is designated as a Provincially Significant Wetland; an Area of Natural and Scientific Interest; and for its Cultural Heritage Value and Interest under the Ontario Heritage Act. It is also designated as an Urban River Valley within the Greenbelt.

Friends of Second Marsh (FSM) is a registered Canadian charity dedicated to encouraging the protection and appreciation of Second Marsh and our natural heritage system; to promoting a healthy environment through education, communication; and developing partnerships and fostering connections with all sectors of the community.

For over 54 years, since the early 1970's, FSM (formerly the Second Marsh Defense Association) has provided leadership to the community-based movement that secured the future of Second Marsh.

FSM is requesting that the Ontario government ***pause*** the amalgamation of the 36 conservation authorities into seven regional conservation authorities as proposed in ERO #025-1257. Please allow the Ontario Provincial Conservation Agency to fulfil its objectives, as indicated in Schedule 3 - Part VIII.1 of Bill 68, and then review the need for amalgamation after the completion of its term.

There are a few examples of previous amalgamations that have taken place that can be used to help guide this process. One example is Bill 135, Ontario's Convenient Care at Home Act, 2023.

We want to ensure that this proposed amalgamation is in the best interest of the work that conservation authorities are mandated to do. As well, if amalgamation is still an option for consideration, then it must be done in such a way that conservation authorities can serve their intended role as ***local watershed experts***.

FSM recognizes that there may be some value in enhancing clarity and consistency through more standardized policies, guidelines and permitting processes in a way that empowers conservation authorities to fulfill their role with greater efficiency. As well, some smaller conservation authorities could benefit from amalgamation with larger conservation authorities. However, amalgamation of 36 conservation authorities to seven regional conservation authorities is problematic. Below, FSM has outlined some concerns with the amalgamation that need to be carefully considered by the province before any action is taken.

Continuation of Partnerships and Committees

FSM has been a long-time community partner of Central Lake Ontario Conservation Authority (CLOCA). We support the work they do in our community and we partner with CLOCA on some very important projects. CLOCA staff have unique and local knowledge of the area.

Will our current conservation authority be able to continue to fulfill its partnership and committee responsibilities? For example, CLOCA staff are the lead for the Second Marsh Steering Committee, the Technical Team for the Second Marsh Restoration and the Durham Region Working Group for Phragmites. FSM is part of all of these committees. CLOCA staff must remain involved with these partnerships and committees to ensure connectivity to the local community.

Continuation of Projects

Will the responsibilities of the current conservation authority staff continue to be tied to the conservation areas and projects they have worked in for many years? For example, CLOCA is the lead on the Oshawa Second Marsh restoration project. That project should stay with CLOCA staff even if they amalgamate with other conservation authorities. As well, we would want to see CLOCA staff continue to monitor the Oshawa Second Marsh as part of the Durham Region Coastal Wetlands Program. CLOCA monitoring of Second Marsh has been ongoing since 2002. The data collected is important for tracking the health of Oshawa Second Marsh.

Permits

FSM is in the process of rebuilding viewing platform overlooking Oshawa Second Marsh. We need permits for this construction from CLOCA. With the proposed amalgamation, we are concerned that this could be a desk top exercise by some conservation staff with no local knowledge of the area. Conservation authorities have unique and local knowledge of the areas that they work in and we need CLOCA staff to continue to review permits for FSM and the Oshawa Second Marsh.

Vast Area of Amalgamation

How will local community initiatives and interests be protected and addressed with a regional conservation authority system? Currently, CLOCA represents seven municipalities. Board Members are selected from those seven municipalities to provide local context and decision-making. The proposed East Lake Ontario Regional Conservation Authority that CLOCA is proposed to be part of, will amalgamate eight conservation authorities and represent 48 municipalities. The new proposed boundaries are far too sprawling to enable locally relevant decision-making to take place.

As well, the vast area of amalgamation ignores the completely different ecology, hydrology and climate of the regions these watersheds are part of. Conservation authorities located in the southern areas may or may not be dealing with the same environmental conditions as the conservation authorities in the northern areas. Amalgamation for some of the proposed regional conservation authorities does not take into consideration the unique needs of their watersheds and their distinctly different environmental conditions. Amalgamation will contribute to a loss of priorities at the local level.

Amalgamating these conservation areas will not guarantee greater efficiency, may sacrifice local priorities for regional priorities and will be inevitably be very costly to implement.

For the reasons above, we request that the province pause the proposed amalgamation of conservation authorities and look at fulfilling the objectives of the Ontario Provincial Conservation Agency as a priority. Conservation authorities should be meaningfully supported and empowered to do their jobs effectively and continue to serve their communities at a local level.

Regards,

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